

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

-----X

CONTINENTAL CASUALTY COMPANY,

Plaintiff,

Case No. 11 CIV 3979 (CS)

v.

MARSHALL GRANGER & COMPANY, LLP,  
and LAURENCE M. BROWN,

**PLAINTIFF CONTINENTAL  
CASUALTY COMPANY'S  
NOTICE OF MOTION FOR  
SANCTIONS**

Defendants,

and

JOSEPH J. BOUGHTON, JR. and  
NORTHSTAR INVESTMENT GROUP, LTD.

Defendants-Intervenors.

-----X

PLEASE TAKE NOTICE that, upon the accompanying Memorandum of Law In Support of Its Motion for Sanctions and all exhibits thereto, Plaintiff Continental Casualty Company (“Continental”) shall move this Court, before the Honorable Cathy Seibel, United States District Judge, at the Honorable Charles L. Brieant, Jr., Federal Building and Courthouse, 300 Quarropas Street, White Plains, NY 10601-4150, on a date and at a time to be designated by the Court, for an order imposing sanctions on Defendants-Intervenors Joseph J. Boughton, Jr., and Northstar Investment Group, Ltd., as well as their counsel, John Schryber of Reed Smith LLP and Jeremy King of Olshan Frome Wolosky LLP, and Mr. Schryber's and Mr. King's respective law firms. Continental seeks sanctions pursuant to Rule 11 of the Federal Rules of Civil Procedure, 28 U.S.C. § 1927, and the Court's inherent authority.

Respectfully submitted,

Richard A. Simpson  
(rsimpson@wileyrein.com)  
*Admitted Pro Hac Vice*  
Kimberly A. Ashmore  
(kashmore@wileyrein.com)  
*Admitted Pro Hac Vice*  
Ashley E. Eiler  
(aeiler@wileyrein.com)  
*Admitted Pro Hac Vice*  
WILEY REIN LLP  
1776 K Street, N.W.  
Washington, DC 20006  
(202) 719-7000

DATED: July 18, 2016  
Washington, D.C.

By: /s/ Richard A. Simpson  
*Attorneys for Plaintiff*  
*Continental Casualty Company*

**CERTIFICATE OF SERVICE**

I hereby certify that on this the 18th day of July, 2016, a true and correct copy of the foregoing document was served *via* electronic and first-class U.S. mail, postage prepaid, upon the following:

Patrick J. Bliss, Esq.  
399 Knollwood Road  
Suite 204  
White Plains, NY 10603  
(pjbesq@aol.com)

*Attorney for Defendant Marshall Granger & Co., LLP*

John W. Schryber, Esq.  
Andrew Weiner, Esq.  
Kristin Cooke Davis, Esq.  
REED SMITH LLP  
1301 K Street, N.W.  
Suite 1100 - East Tower  
Washington, D.C. 20005  
Phone: 202- 414 9277  
Facsimile: 202 414 9299  
(JSchryber@ReedSmith.com)  
(AWeiner@ReedSmith.com)  
(KDavis@ReedSmith.com)

Jeremy M. King, Esq.  
Ellen Holloman, Esq.  
OLSHAN FROME WOLOSKY LLP  
Park Avenue Tower  
65 East 55th Street  
New York, NY 10022  
(JKing@olshanlaw.com)  
(EHolloman@olshanlaw.com)

*Attorneys for Defendants-Intervenors Joseph J. Boughton, Jr.  
and Northstar Investment Group, Ltd.*

/s/ Richard A. Simpson  
Richard A. Simpson